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# Guide to Addressing and Removing Environmental Supervision Records

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Blue Map Database

**IPE**  **公众环境研究中心**  
Institute of Public & Environmental Affairs

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Note: This new edition of the guidelines takes effect immediately. The previous guidelines on record removal are now considered null and void.

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Since 2006, the Institute of Public & Environmental Affairs (IPE) has continuously collected, collated and analyzed government and corporate environmental information. IPE's continual gathering of government-published data, including environmental quality information, emissions data and pollution source supervision records from 31 provinces and 338 prefecture-level cities, has generated a set of environmental data resources of considerable scope and application value.

IPE's Blue Map website (<http://www.ipe.org.cn/>) aims to provide stakeholders with an open data platform to more effectively participate in environmental governance. With the expansion of environmental information disclosure in China, the number of corporate environmental supervision records added to the Blue Map Database has continued to grow, topping one million such records in May 2018.

In order to help stakeholders access environmental information, and also provide a platform for corporate information disclosure, we offer two methods for enterprises to address their supervision records: "information disclosure" and "record removal."<sup>1</sup>

## 1. Information Disclosure

"Information disclosure" refers to companies' disclosure of materials such as feedback explaining the reasons causing a violation record to be issued, as well as information about the status of follow-up corrective actions and the enterprise's current compliance situation.

Enterprises that desire to publish documents can send them directly to their customer brand's designated contact at IPE after affixing the official company seal. IPE will upload them to the "enterprise feedback" section of the "records" page on the IPE database; this process does not require any fees to be paid. Explanatory documents include but are not necessarily limited to the following:

- a. Reason for violation: Administrative penalty decisions issued by environmental protection departments; explanatory statements clarifying the company's reason for the violation record;
- b. Adoption of corrective measures: Explanatory documents issued by the company about corrective measures taken; verification documents issued by environmental protection departments about the completion of corrective actions;
- c. Management situation of pollution control equipment and contingency plans: Online monitoring data; environmental protection departments' monitoring reports; third-party monitoring reports.

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<sup>1</sup> For more information, call IPE at: +86 10-67189470 or write to [ipe@ipe.org.cn](mailto:ipe@ipe.org.cn).

**Note:**

- (1) Rectification measures, explanations, and other documents provided by the enterprise (or any document not originating from a third party) should be officially stamped or sealed by the company.
- (2) Documents issued by environmental protection departments must include the seal of the relevant department. If the seal is missing, then a full version of the documents signed by government officials may be provided.

Information disclosure will not suffice to remove a record; the corporate environmental supervision record will remain in the Blue Map Database.

Meanwhile, all enterprise feedback information will also be published in the “IPE Notices” section of the website.<sup>2</sup>

## 2. Removal of Corporate Environmental Supervision Records

If the enterprise ultimately wants to remove its environmental supervision record(s) from the Blue Map Database, the enterprise must make practical improvements. It also must pass a Green Choice Alliance (GCA) audit to verify the effectiveness of corrective actions and determine whether they are sufficient to enable the enterprise to consistently achieve compliance.

Based on aspects such as the year and details of the violation in the environmental supervision record, there are two different means of record removal: an off-site document review and an on-site third-party audit. All judgments on the standards for auditing procedures are made by IPE.

### 2.1 Off-site Document Review

Off-site document review refers to a process whereby an enterprise publicizes relevant documents and environmental protection data to confirm the reason for its supervision record, what corrective actions it has carried out, and the current state of its environmental management practices.

Document reviews are carried out by IPE. Relevant documents, environmental data (such as wastewater or air emissions monitoring reports), and review results are disclosed to the public.

If the corporate environmental record falls into one of the following categories, the enterprise may undergo an off-site document review in order to remove its record<sup>3</sup>:

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<sup>2</sup> <http://www.ipe.org.cn/Notice/Notice.aspx>

<sup>3</sup> IPE reserves the final right to interpretation on all matters. For all matters not covered, please contact IPE.

Type	Supervision Record Details	Document List
Document or procedural issue	<ul style="list-style-type: none"> <li>- Did not carry out “three synchronizations” requirement for EIAs (the design, construction and beginning of operation of the construction project’s pollution prevention and control equipment was not carried out in tandem with the main engineering processes for the project), and the issue in question does not relate to wastewater, air emissions or solid waste</li> </ul>	<ul style="list-style-type: none"> <li>- Approval and acceptance for “three synchronizations” requirements</li> <li>- Environmental monitoring records for the past 24 months</li> </ul>
	<ul style="list-style-type: none"> <li>- Enterprise did not obtain a discharge permit due to reasons relating to government approval</li> </ul>	<ul style="list-style-type: none"> <li>- Updated emissions permit</li> <li>- Monitoring reports from the period during which the emissions permit was expired</li> <li>- Environmental monitoring records for the past 24 months</li> </ul>
Review & clean-up of illegal construction projects	<ul style="list-style-type: none"> <li>- Issues relating to the local review and clean-up of historical environmental violation issues, such as construction without approval, construction not conforming to approval, and beginning production without first passing through verification</li> </ul>	<ul style="list-style-type: none"> <li>- Approval and acceptance for “three synchronizations” requirement</li> </ul>
Enterprise environmental credit rating/“yellow card”	<ul style="list-style-type: none"> <li>- Did not complete cleaner production/environmental certification</li> <li>- Environmental performance and investment did not see significant improvement</li> <li>- Did not complete environmental report/emissions report by deadline</li> <li>- Unable to offer a reason for yellow card violation, but enterprise does not produce wastewater, air emissions or solid waste</li> </ul>	<ul style="list-style-type: none"> <li>- Initial notice listing environmental credit ratings</li> <li>- Document showing proof of rectifications</li> <li>- Proof of no violation records after the implementation of rectifications or equivalent level of assessment</li> <li>- Environmental monitoring records for the past 24 months</li> </ul>
Requirements for temporary limitation of production	<ul style="list-style-type: none"> <li>- Did not comply with requirements for heavy pollution weather warning(s) and adopt production limitation measures accordingly</li> </ul>	<ul style="list-style-type: none"> <li>- Written explanation of reason for violation and corrective actions</li> <li>- Verification of production reduction measures</li> <li>- Contingency plan to meet requirements for ceasing production during heavy pollution</li> </ul>

Online monitoring equipment	- Emissions shown as exceeding standards or no data shown due to malfunction of online monitoring equipment	- Government approval document confirming malfunction of online monitoring
	- Online monitoring equipment was never approved or has not undergone data validity verification	- Inspection documents or proof of data validity
	- Key pollution source refused to install automatic monitoring equipment, or did not install automatic monitoring equipment and connect it with the automatic monitoring network website by the deadline, etc. - Did not disclosure annual self-monitoring plan	- Acceptance check of online monitoring equipment - Data validation verification - Verification of publication of self-monitoring plan - Online monitoring data for most recent six months
	- Entity responsible for operating the online monitoring equipment received an environmental supervision record, and the record does not relate to data fraud issues	- Explanation of the reasons for failure of online monitoring to undergo auditing for effectiveness or malfunctioning - Written government verification of follow-up rectifications
Disabling of equipment	- Equipment that caused excessive emissions has been suspended or disabled, and there are no other pollutant emissions of a similar variety	--Written explanation of reason for violation - Written proof that equipment has been disabled - Written proof that there are no other pollutant emissions of a similar variety - Environmental monitoring records for the past 24 months
Accident	- Accidental fire or explosion that does not significantly impact the environment	- Written explanation of the reason for the accident - Written government verification of follow-up rectifications - Environmental monitoring records for the past 24 months
	Did not undertake environmental incident risk assessment work	- Filing of emergency contingency plan - Emergency response drills

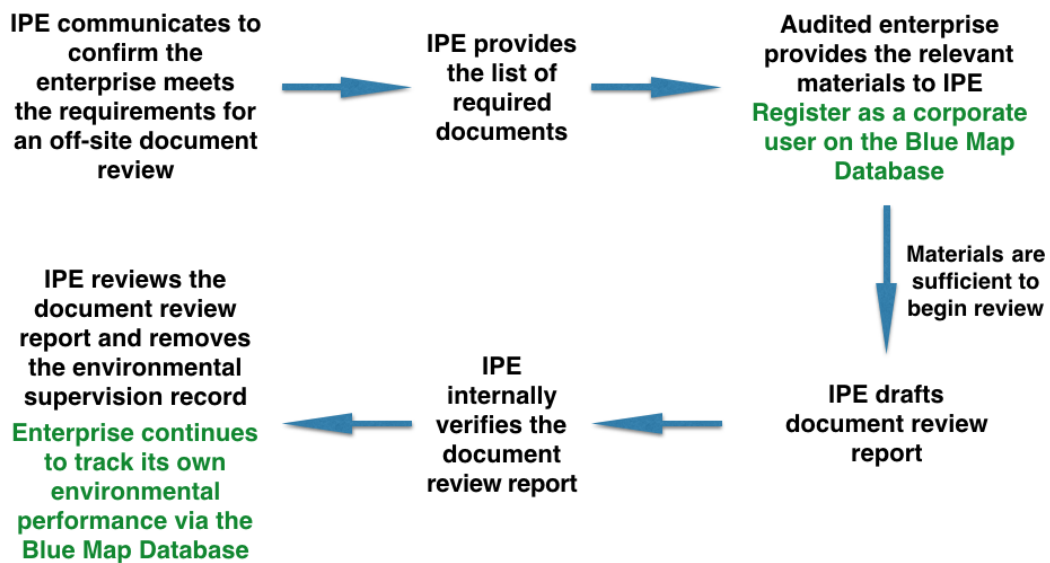
<p>Energy efficiency violation</p>	<ul style="list-style-type: none"> <li>- Production and use of energy-intensive and outdated products, equipment and processes that have been eliminated by the state</li> <li>- Production processes are unable to comply with mandatory energy consumption standard limits and/or energy efficiency standards, and energy consumption data cannot be verified</li> <li>- Punitive electricity pricing, differential pricing, ladder pricing</li> <li>- Energy statistics and energy measurement do not meet national requirements</li> <li>- Forging and/or tampering with energy consumption data</li> <li>- Other violations of energy conservation laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> <li>- Written government verification of follow-up rectifications</li> </ul>
<p>Noise</p>	<ul style="list-style-type: none"> <li>- Noise disturbs residents</li> </ul>	<ul style="list-style-type: none"> <li>- Written explanation of reason for violation and corrective actions</li> <li>- Noise monitoring report</li> </ul>
<p>Dust</p>	<ul style="list-style-type: none"> <li>- No dust prevention measures</li> <li>- Open-air piling/stacking</li> <li>- Storage yard lacks coverage</li> <li>- Dust pollution</li> </ul>	<ul style="list-style-type: none"> <li>- Written explanation of reason for violation and corrective actions</li> <li>- Monitoring reports for unorganized emissions for past 24 months</li> </ul>
<p>Nuclear Safety</p>	<ul style="list-style-type: none"> <li>- Violation of the Regulations on the Supervision and Management of Civil Nuclear Safety Equipment</li> </ul>	<ul style="list-style-type: none"> <li>- Written explanation of reason for violation and corrective actions</li> <li>- Verification of corrective measures issued by the MEP Office of Nuclear and Radiation Safety Inspection</li> </ul>
<p>Hazardous Waste</p>	<ul style="list-style-type: none"> <li>- Hazardous waste storage sites do not conform to standards</li> <li>- Containers and packaging for hazardous waste, and/or facilities and entities for collection, storage, transport, and handling of hazardous waste, are not properly labelled</li> <li>- Supply or entrust a business unit without a permit to engage in the collection, storage, utilization and/or handling of hazardous waste of a quantity less than three tons</li> <li>- Does not fill in hazardous waste transfer list according to national regulations or did not seek approval to transfer hazardous waste,</li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> <li>- Hazardous waste management plan</li> <li>- Hazardous waste transfer list</li> <li>- Treatment contract and business qualifications for hazardous waste treatment plant</li> <li>- Environmental supervision records for the past 24 months</li> </ul>

	<p>and total volume of waste is less than three tons</p> <ul style="list-style-type: none"> <li>- Mixes hazardous waste with non-hazardous waste for storage, and total quantity of hazardous waste is less than three tons</li> </ul>	
Imported Wastes	<ul style="list-style-type: none"> <li>- Suspected transfer of imported waste plastics</li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> </ul>
	<ul style="list-style-type: none"> <li>- Suspected fraudulent import license (imported wastes)</li> </ul>	
Carbon Emissions Trading	<ul style="list-style-type: none"> <li>- Failed to comply with carbon trading requirements on time and in full</li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> <li>- Written government verification of follow-up rectifications</li> </ul>
Supervision record	<ul style="list-style-type: none"> <li>- Information published by the government is erroneous or leads to misunderstanding</li> <li>- Error by party responsible for record publication or input</li> </ul>	<ul style="list-style-type: none"> <li>- Document verifying the record is erroneous (such as that day's online monitoring data or third-party test report)</li> <li>- Clarifying document or explanatory statement</li> <li>- Provide online monitoring data from the past six months or monthly third-party manual monitoring data</li> </ul>
Other	<ul style="list-style-type: none"> <li>- Over 2 years have passed since the time of violation<sup>4</sup></li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> <li>- Environmental supervision records for the past 24 months</li> <li>- Written government verification of fulfilling necessary requirements</li> </ul>
	<ul style="list-style-type: none"> <li>- Entity compiling the EIA report was reported due to EIA quality issues</li> <li>- Other violations relating to the agency compiling the EIA</li> </ul>	<ul style="list-style-type: none"> <li>- Written government verification of fulfilling necessary requirements</li> </ul>
	<ul style="list-style-type: none"> <li>- Did not participate in regular testing of motor vehicle emissions on schedule</li> </ul>	<ul style="list-style-type: none"> <li>- Written government verification of regular testing of motor vehicle emissions</li> </ul>

<sup>4</sup> The time of violation refers to the date of the violation occurred, as listed in the supervision record. If the date was not mentioned in the supervision record, then it refers to the date of issuance of the penalty decisions by the environmental protection departments; otherwise, it refers to the publication time listed by the "supervision record source".



The off-site document review process to remove environmental supervision records is shown below.



- NOTE:**
- (1) The IPE internal review of the report will be completed within five working days after the report draft is completed.
  - (2) Some enterprises may not be able to pass the document review process. If this situation occurs, then the enterprise may finish the document review after adopting corrective actions. If necessary, an on-site audit may be conducted to determine if the record can be removed.
  - (3) To register as a corporate user on the Blue Map Database, please click: <http://wwwen.ipe.org.cn/User/Login.aspx>

## 2.2 On-Site Third-Party Audit

On-site third-party audits are carried out by IPE-approved third-party auditing companies (hereafter referred to as “auditing agencies”). The audit is aimed at verifying the enterprise’s pollution management and control status. IPE or an environmental NGO in the Green Choice Alliance will review and monitor the audit process. Audit results and conclusions shall be publicly disclosed.

### 2.2.1 Objective of On-Site Audit

The on-site third-party audit aims to evaluate the comprehensiveness, effectiveness, and compliance status of an enterprise’s pollutant management and control systems. The auditing

process focuses on:

- 1) The effectiveness of the enterprise in correcting the violations raised in its environmental supervision record(s);
- 2) Whether the enterprise is able to abide by the requirements of relevant laws, regulations and standards for the production, collection, storage, processing, discharge and transfer of pollutants during normal and irregular production as well as processes for emergency situations, operations and service provision. “Pollutants” refer to industrial water, domestic wastewater, industrial air emissions, kitchen waste, hazardous waste, etc.;
- 3) The enterprise’s established environmental management system, and the capacity of its pollution control equipment to operate regularly.

### 2.2.2 Qualifying Conditions for On-Site Audit

Supervision records issued within the previous two years<sup>5</sup> and touch upon the following situations require the completion of an on-site third-party audit in order to be removed<sup>6</sup>:

- Illegal emissions of pollutants in excess of national pollutant discharge standards or pollutant emissions standards legally established by people’s governments of provinces, autonomous regions, or provincial-level municipalities; discharging pollutants in excess of key pollutant volume control standards;
- Illegally discharging pollutants through means avoiding supervision, such as hidden pipes, seepage wells, sewage pits, or perfusion (i.e. discharging pollutants through channels apart from legally sanctioned discharge outlets, etc.)<sup>7</sup>, among which:
  - ✓ “Hidden pipes” are sewage pipes set up to achieve circumvention of supervision through covert methods, including buried cement, porcelain and/or plastic pipes, as well as temporary sewage pipes laid above ground;
  - ✓ Seepage wells and sewage pits are closed or semi-enclosed pits, pools, ponds, wells, trenches, canals, etc. that have no anti-leakage measures or are unable to protect against seepage;
  - ✓ Perfusion refers to the discharge of pollutants underground through deep, high-pressure wells.
- Illegal discharge of pollutants by tampering with and forging monitoring data in order to evade supervision, including the following situations:

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<sup>5</sup> The time of violation refers to the date of the violation occurred, as listed in the supervision record. If the date was not mentioned in the supervision record, then it refers to the date of issuance of the penalty decisions by the environmental protection departments; otherwise, it refers to the publication time listed by the “supervision record source”.

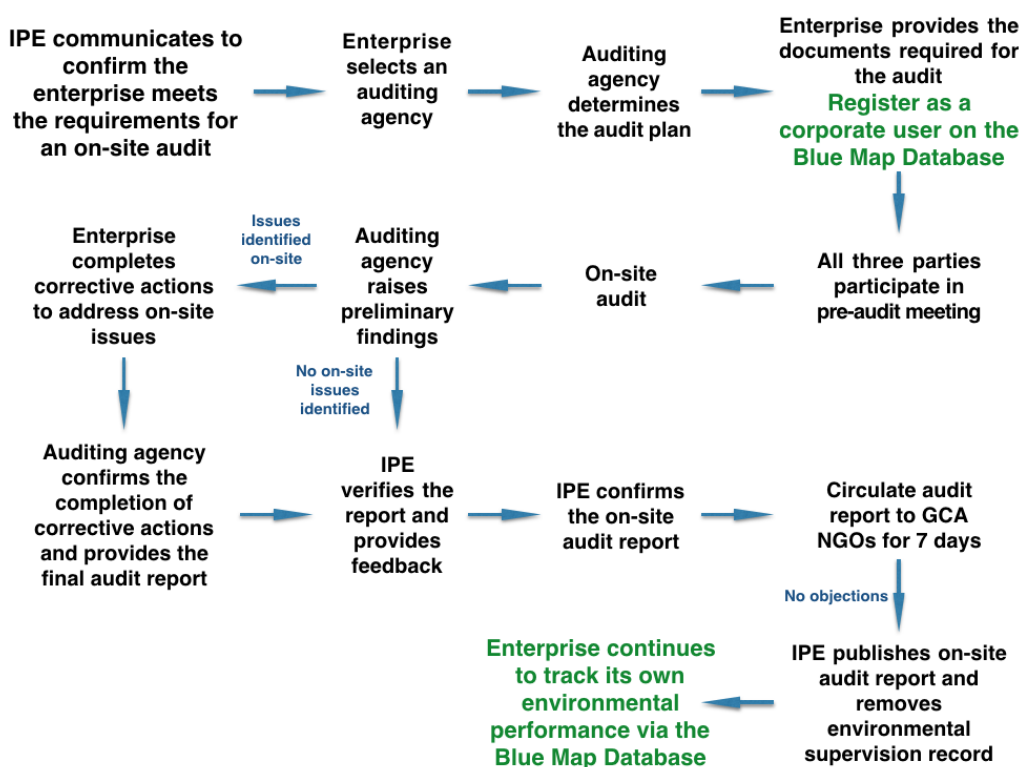
<sup>6</sup> IPE reserves the final right to interpretation on all matters. For all matters not covered, please contact IPE.

<sup>7</sup> Not limited to records with a publication date within the previous two years.

- ✓ Violating national regulations by making deletions, altering, making additions or interfering with pollution source control systems, or making deletions, altering, or making additions to the memory, processing and/or transmission of data and application procedures of pollution source control systems, thus causing such systems to be incapable of functioning properly;
  - ✓ Destroying and/or damaging monitoring equipment, communication lines, information acquisition and transmission equipment, video equipment, power equipment, air conditioners, fans, sampling pumps and other monitoring equipment, as well as destroying or damaging the sampling lines of monitoring equipment, monitoring instruments, and/or meters.
  - ✓ Intentionally diluting discharged pollutants in order to interfere with monitoring data;
  - ✓ Other situations that prevent monitoring and monitoring equipment from functioning properly.
- Unlicensed idling or dismantling of pollution prevention and control equipment, resulting in abnormal operation of such equipment, as well as failure to install pollutant treatment equipment. "Abnormal operation of pollution prevention and control equipment" includes the following situations:
- ✓ Directly discharging some or all pollutants without first passing through treatment equipment;
  - ✓ Opening the emergency discharge valve of pollutant treatment equipment in a situation other than an emergency and directly discharging some or all pollutants;
  - ✓ Directly discharging untreated pollutants from the intermediary processes of pollutant treatment equipment;
  - ✓ Ceasing operation of pollutant treatment equipment during production or during operational processes;
  - ✓ Use of pollutant treatment equipment in violation of operating procedures, causing the treatment equipment to be incapable of functioning properly;
  - ✓ The pollutant-discharging entity does not perform inspections and repairs in a timely manner or according to regulations after the malfunctioning of pollutant treatment equipment, resulting in the treatment equipment being incapable of functioning properly.
- Refusal to carry out the requirements of fines, orders to suspend production or cease production, administrative detention, temporary suspension or revocation of permits, temporary suspension or revocation of sales licenses and other administrative punishments, including:
- ✓ Construction project did not carry out environmental impact assessment according to law and has been ordered to cease construction, yet refuses to do so;
  - ✓ Violation of laws and regulations due to failure to obtain pollution discharge permit to discharge pollutants and ordered to cease discharge, yet refuses to do so.

- Records involving the enterprise being listed for supervision, administrative detention that has been transferred to the Ministry of Public Security, ceasing of production, daily penalties, seizure of property and/or assets, or the enterprise being reported due to a significant environmental accident;
- Obstruction of environmental supervision inspection or sudden environmental incident investigation;
- Illegal emissions, dumping, or handling of hazardous waste of three tons or more;
- Enterprise receives a red or black environmental credit rating;
- Enterprise receives a yellow environmental credit rating, and the reason for the yellow rating involves issues relating to wastewater, air emissions, and/or solid waste disposal;
- Enterprise is reported for a major environmental accident, such as a liquid or gas leakage, or spillage of slag or mining waste;
- Discharging, dumping and/or disposing of radioactive wastes, wastes containing pathogens of infectious diseases, and/or toxic substances into Class I drinking water source protected areas and/or core nature protected areas;
- Illegal discharge of substances containing heavy metals, persistent organic pollutants, and other pollutants which seriously harm the environment and damage human health in excess by three multiples or more of national pollutant discharge standards or pollutant discharge standards legally set by provinces, autonomous regions and/or provincial-level municipalities;
- Other circumstances that seriously pollute the environment.

### 2.2.3 Overview of On-Site Audit Process



- NOTE:** (1). Before the audit takes place, the auditing company should confirm that: the manufacturing activities at the enterprise being audited are being carried out normally; production lines are running normally; **production load is at more than 75% capacity**, and relevant treatment systems for wastewater and air emissions are running normally.
- (2). Audited companies must guarantee the singularity of the corporate supervision record(s). If other records exist apart from those already entered into the “Supervision Records” section of the Blue Map Database, those other records must be provided to the auditing company and to IPE before the on-site audit takes place.
- (3). In order to ensure the fairness of the audit, the participating enterprise, auditing agency and environmental organization(s) must sign the “On-Site Audit Statement” (see Appendix 3).

#### **2.2.4 Relevant Responsibilities of Participating Parties**

Responsibilities of the participating enterprise, auditing agency, and IPE or other environmental NGO in the Green Choice Alliance (GCA) over the course of the on-site audit are as follows:

- a) The audited enterprise should:
- Arrange relevant personnel to cooperate with the auditing agency throughout all audit processes;
  - Commit to disclose the audit results and report to the public;
  - Undertake all audit costs;
  - Push all suppliers with existing environmental supervision records (including centralized wastewater treatment plants, hazardous waste transporters and processors and other pollutant operations and treatment facilities, and outsourced facilities that touch upon pollutant production segments) to issue public explanations of their environmental supervision record(s).
- b) The auditing agency should:
- Provide a set audit team<sup>8</sup> to conduct the audit (at least one principal auditor must participate in and lead the audit). The team should have experience in conducting GCA audits to ensure that the audit staff are familiar with the contents and methodology of the on-site audit, and that the audit be carried out objectively and impartially;
  - Maintain a responsive communication channel between IPE and the audited company, communicate in a timely fashion with the audited enterprise about the audit, and promptly submit feedback toward IPE's views;
  - As a professional team, resolve any doubts expressed by IPE or the GCA environmental NGO in a timely fashion. The audit team shall make professional expert judgements and

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<sup>8</sup> If the audit team desires to change its personnel, it must inform IPE in advance and receive final confirmation from IPE.

provide reasonable regulatory explanations for issues discovered during the course on the on-site audit;

- Maintain confidentiality toward the financial and technological information provided by the audited enterprise.

c) IPE or other Green Choice Alliance (GCA) NGO should:

- Supervise the on-site audit and verify that the audit is conducted according to regular procedures;
- Maintain strict confidentiality toward the financial and technological information provided by the audited enterprise;
- Publicly disclose the audit report and results.

Responsibilities of each participating party during the auditing process (the audited enterprise, the auditing agency, and IPE or other environmental NGO in the Green Choice Alliance) are as follows:

Audit Segment	Relevant Responsibilities of Participating Parties		
	Enterprise	IPE	Auditing Agency
Confirm the on-site audit	Accept the conditions of the audit and commit to carrying out a third party on-site audit	Provide the audit standards and a list of approved auditors	N/A
	Choose an auditing company;  Submit the required documents (See Appendix 2);  Pay audit fees	Verify the credentials of the auditing company	Confirm the scope of the audit with IPE and the enterprise;  Provide IPE with materials on the enterprise's status;  Organize a pre-audit meeting with the three parties to clarify audit procedures and objectives
Carry out on-site audit	Confirm that the manufacturing activities at the enterprise being audited are being carried out normally; production lines are running normally; production load	Supervise the on-site audit (or arrange GCA environmental organization to serve as the NGO representative and supervise the audit);  Promptly inform the	Chair the opening meeting;  Lead the on-site document audit, on-site investigation, interviews, and sampling (if necessary);  Confirm on-site findings with participating supervising

	<p>is at more than 75% capacity, and treatment systems for relevant wastewater and air emissions are running normally;</p> <p>Organize relevant personnel to cooperate on the on-site audit, and provide accurate and honest information</p> <p>Sign audit statement (see Appendix 3)</p>	<p>auditing company of anything that could affect the normal auditing procedures;</p> <p>Communicate on-site audit findings;</p> <p>Verify that the audit process was normal;</p> <p>Sign audit statement (Appendix 3)</p>	<p>environmental NGO;</p> <p>Sign audit statement (Appendix 3);</p> <p>Host final meeting after audit is completed, inform enterprise of audit results and on-site findings</p>
Prepare preliminary audit report	<p>Provide supplementary documents that cannot be provided on-site;</p> <p>Obtain preliminary audit report</p>	<p>Obtain and check the preliminary audit report, and provide feedback</p>	<p>Write preliminary audit report;</p> <p>Send report to IPE to verify and to the audited enterprise</p>
Follow-up	<p>Carry out corrective actions related to non-compliances discovered during the audit; provide true and accurate information;</p> <p>If a follow-up supplementary audit is required, prepare the necessary staff to take part</p>	<p>Track progress of enterprise follow-up actions;</p> <p>Supervise the supplementary on-site audit, and promptly communicate with the auditing agency about any circumstance that may affect the normal implementation of the audit;</p> <p>Verify and provide feedback on the final audit report</p>	<p>Clarify the nature of the enterprise's environmental violation record, track progress of enterprise's follow-up actions, and conduct follow-up audit if necessary;</p> <p>Conduct evaluation of the effectiveness of corrective actions and draft the final audit report;</p> <p>Send report to IPE to verify and to the audited enterprise;</p> <p>Complete the final audit report based on IPE's feedback</p>

Publish audit conclusions	N/A	Confirm audit report;  Circulate audit report to other GCA NGOs for a further period of 7 days. If there is no objection, then the corporate environmental supervision record may be removed from the Blue Map Database	N/A
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NOTE: IPE or GCA environmental NGOs cannot accept any cash or gifts from the audited enterprise in any form whatsoever and cannot charge consulting fees. However, they may claim transportation and accommodation expenses, which should be included in the total cost of the audit covered by the audited enterprise.

**2.2.5 Scope of On-Site Third-Party Audit**

The auditing agency shall conduct the on-site audit based on relevant laws, regulations and standards for environmental protection (see Annex 1). The audit shall cover the following:

**(1) Planning**

Identification of relevant factors and establishment of control plans

- a) Evidence must be provided to demonstrate that during the factory design, construction and operation phases, the audited enterprise has carried out required environmental protection measures and environmental assessments, and has acquired necessary environmental permits from relevant environmental administrative departments according to the “three synchronizations” system;
- b) Before major alterations occur in production technology, scale, workshops, equipment, etc., the enterprise should further identify risk factors related to pollutant management and control, and draft relevant control plans and measures;
- c) The enterprise should demonstrate that it has already carried out necessary pollutant control measures to manage the risks identified in relevant assessment reports.



#### Compliance requirements

- a) The enterprise must demonstrate its understanding of each requirement related to pollutant management laws, regulations and technology standards, such as: requirements for pre-treatment, pollutant concentration limits for effluent, limits on the total quantity of discharged pollutants, monitoring requirements, etc. The enterprise should be able to demonstrate its understanding of how the regulations and standards are applied to standard business operations;
- b) The enterprise should prepare relevant procedures to demonstrate understanding of the latest pollutant management regulations, and provide evidence to verify that control programs and measures are in place and sufficient to attain compliance with relevant environmental regulations.

## **(2) Operation and Implementation**

#### Risk management resources, roles, responsibilities and authority

- a) The enterprise shall demonstrate adequate resources for management and control plans related to risk factors, including human resources, technical training and expertise, as well as financial resources for relevant facilities, equipment and technology.
- b) A qualified manager should be in charge of the overall pollutant management plan and operations. For management of other factors related to pollutant management, the enterprise should appoint qualified personnel and define their responsibilities and levels of authority.

#### Capacity-building and training

- a) The enterprise should ensure that the personnel responsible for the control of pollutant risk factors have the necessary technical capacity, as assessed based on level of education, training, and experience. The enterprise should also provide materials to verify that personnel are adequately qualified.
- b) The enterprise should organize trainings (internal or external) to ensure that personnel understand pollutant management conditions encountered in the workplace, and are able to manage and control the risk factors according to the programs and measures established by the enterprise. All trainings should be documented (e.g. time, place, content, and attendees).

#### Operations management

- a) The enterprise must prove that it has established procedures and operational regulations that ensure safe and compliant normal operating procedures for pollutant management, and regular maintenance of facilities and equipment.
- b) The enterprise must prove that it has established procedures to ensure timely internal

(managers and operators) and external (environmental administrative department and other interest parties) communication related to pollutant treatment and management.

#### Emergency and accident management

- a) The enterprise must verify that it has conducted a pre-assessment of risk factors related to pollutant discharge accidents. It must demonstrate that it has set up relevant safeguard management procedures including personnel planning, and facilities and equipment emergency monitoring to manage potential risks. The enterprise must verify that it conducts regular emergency response training, and regularly verifies the status of relevant equipment in order to ensure early response to emergencies and minimize harmful effects of accidents.
- b) The enterprise must provide evidence that it has set up internal (enterprise headquarters) and external (administrative department and other interested parties) accident notification procedures.
- c) The enterprise must provide evidence that it has established accident investigation procedures to ensure early identification of an accident's root cause and means to identify responsible personnel or system failure. A system should also be installed to analyse the accident *ex-post*, and determine a rectification plan to avoid similar accidents in the future.
- d) All accidents and accidents investigations should be clearly documented.

### (3) Inspection

#### Monitoring and recording

- a) The enterprise shall regularly assess the working conditions of relevant personnel as well as the operations status of facilities and equipment. All assessment and maintenance records should be documented.
- b) According to relevant laws and regulations, all pollutants generated should be regularly measured and monitored. The monitored parameters should be determined according to the characteristics of the pollutants generated. Records of sampling processes and analysis results should be saved.
- c) If the enterprise conducts pollutant monitoring internally, equipment and chemicals for monitoring should be periodically calibrated to ensure the accuracy of the monitoring results. Evidence of these activities should be provided.

#### Rectification and prevention measures

- a) The enterprise should set up rectification procedures for timely improvement of non-compliance identified in any assessments. Records of such procedures and improvement efforts should be documented.
- b) The enterprise should establish risk-prevention procedures for potential risks as identified in the assessment process.
- c) The enterprise should set up monitoring and assessment procedures of all rectification and

prevention measures to ensure the validity of measures taken to fix non-compliant processes or equipment.

Note: If, during the course of the off-site document review and on-site third-party audit, the enterprise conceals facts, or forges or fabricates documents, influencing the audit judgments and audit conclusions, upon such a discovery, IPE will reinstate the removed environmental supervision record. If the record has not yet been fully removed, then the enterprise must first publicly disclose an explanation about the aforementioned concealment of facts and/or forged or fabricated documents.

## Appendix 1: Relevant Laws, Regulations and Standards

### 1. Including but not necessarily limited to the following laws and regulations:

- a) Environmental Protection Law of the People's Republic of China (PRC)
- b) Water Pollution Prevention and Control Law of the PRC
- c) Air Pollution Prevention and Control Law of the PRC
- d) PRC Law on the Prevention and Control of Environmental Pollution from Solid Waste
- e) Environmental Impact Assessment Law of the PRC
- f) Measures for the Environmental Management Registration of Hazardous Chemicals (Trial)
- g) Measures on the Management of Hazardous Waste Manifests
- h) Cleaner Production Promotion Law of the PRC

### 2. Including but not necessarily limited to the following standards:

#### Wastewater

- a) Integrated Wastewater Discharge Standard (GB8978–1996)
- b) Wastewater Quality Standards for Discharge to Municipal Sewers (GB/T31962-2015)
- c) Technical Requirements for Monitoring of Total Amount of Pollutants in Wastewater (HJ/T 92—2002)
- d) Technical Specifications Requirements for Monitoring of Surface Water and Wastewater (HJ/T 91—2002)
- e) Environmental Management Systems – Requirements with Guidance for Use (GB/T24001-2016)

#### Air Emissions

- a) Integrated Emission Standard of Air Pollutants (GB16297-1996)
- b) Emission Standards For Odor Pollutants (GB 14554-1993)
- c) Technical Specifications for Emissions Monitoring of Stationary Sources (HJ/T 397-2007)
- d) Technical Guidelines for Fugitive Emission Monitoring of Air Pollutants (HJ/T 55-2000)
- e) Test Regulations for Cooking Fume Control Equipment (Trial) (HJ/T 62-2001)
- f) Environmental Management Systems – Requirements with Guidance for Use (GB/T24001-2016)

#### Solid Waste

- a) Rules for Storage of Dangerous Chemicals (GB 15603-1995)
- b) Standard for Pollution Control on the Storage and Disposal Site For General Industrial Solid Wastes (GB18599-2001)
- c) Standard for Pollution Control on Hazardous Waste Storage (GB 18597-2001)

3. **Including but not necessarily limited to the following documents:**
  - a. Interim Measures on the Transfer between Administrative Departments of Cases of Environmental Violations for which Administrative Detention May Be Applied
  - b. Interpretation of the Supreme People’s Court and the Supreme People’s Procuratorate on Several Issues Concerning the Application of Law in the Handling of Criminal Cases of Environment Pollution

Note: The most up-to-date version of the above laws, regulations and technical standards issued by the government or industry bodies shall prevail.

## Appendix 2: List of Documents Required to be Submitted for On-Site Audits

Including but not necessarily limited to:

**a) General information about the audited enterprise**

- Enterprise name, address and operations history
- Information related to main facilities and the surrounding geographic area (including the total floor plan of the plant)
- Product information and production scale
- Number of employees, business-operating time and work shifts

**b) Documentation on production processes and pollutant production and discharge:**

- Production flow chart
- List of key raw materials
- For documentation related to pollutant generation, enterprise shall provide information on pollutant output per product unit and variety, quantity and concentration of main pollutants.
- Relevant fugitive emissions information
- Relevant information on discharge of air pollutants not from production

**c) Information about pollution treatment facilities and equipment:**

- Pollutant collection mode (including pollutant pipe network map)
- Pollutant treatment process and related design documentation
- Mode of pollutant discharge
- Sludge treatment and disposal methods

**d) If the enterprise has received any violations or penalties from relevant environmental authorities that involve implementation of corrective actions or punishments, the enterprise shall provide detailed information about the violation(s), including the following:**

- Time and place of the violation(s)
- Officially announced information
- Internal survey results and environmental remediation information
- Official follow-up inspection records

**e) Annual environmental data for the past two years (PRTR form)**

**f) Additional information that the enterprise deems closely relevant to the audit**

### Appendix 3: GCA On-Site Audit Statement

#### Audit Overview

Audit Date: \_\_\_\_\_

Audited Enterprise: \_\_\_\_\_

Third-Party Auditing Agency: \_\_\_\_\_

NGO Participants: \_\_\_\_\_

#### Audited Enterprise Obligations:

1. Provide accurate and reliable documents, data and other information;
2. Disclose audit report to the public;
3. Does not provide cash or gifts to the auditing agency and/ or NGOs in any form whatsoever.

**Audited Enterprise Signature:** \_\_\_\_\_

#### Auditing Agency Obligations

1. Carry out the audit objectively and impartially; assess whether the enterprise's operations management is able to fulfill the requirements of relevant laws and regulations and technical standards;
2. Based on the requirements laid out in the Guide to Addressing and Removing Corporate Environmental Supervision Records, ensure the integrity of the auditing process and accuracy of auditing results, and reject any falsified materials;
3. Ensure that products or services are not advertised or commercialized;
4. Does not receive cash or gifts from the audited enterprise in any form whatsoever.

**Auditing Agency Signature:** \_\_\_\_\_

#### Environmental NGO Participant Obligations:

1. Participate and supervise the audit according to the requirements laid out in the Guide to Addressing and Removing Corporate Environmental Supervision Records;
2. Does not receive cash or gifts from the auditing enterprise or auditing agency in any form whatsoever.

**NGO Representative Signature:** \_\_\_\_\_

**Appendix 4: Green Choice Alliance NGO Members**

No.	环保组织清单 NGO List	
1	Friends of Nature	自然之友
2	Global Village Beijing	地球村
3	Green Earth Volunteers	绿家园志愿者
4	Global Environmental Institute	全球环境研究所
5	Huaihe River Guardians	淮河卫士志愿者协会
6	Gansu Green Camel Bell	甘肃绿驼铃
7	Friends of Green in Tianjin	天津绿色之友
8	Beijing Association of Sustainable Development	北京市可持续发展促进会
9	Center for Legal Assistance to Pollution Victims	中国政法大学污染受害者法律帮助中心
10	Chongqing Green Volunteer Federation	重庆市绿色志愿者联合会
11	Green Hunan	绿色潇湘环境咨询中心
	Hubei Green Hanjiang	襄樊市环境保护协会 (绿色汉江)
13	Xinjiang Conservation Fund	新疆自然保育基金
14	Lvse Jiangnan	苏州工业园区绿色江南公众环境关注中心
15	Yunnan Green Watershed	云南大众流域
16	Wenzhou Green Eyes	温州绿眼睛
17	Dalian Environmental Protection Volunteers Association	大连市环保志愿者协会
18	Green Island	绿岛
19	Green Beagle	北京市朝阳区达尔问环境研究所
20	Shanghai Oasis Ecological Conservation & Communication Center	上海绿洲生态保护交流中心
21	Shaanxi Women's Federation "Red Phoenix Project"	陕西省红凤工程志愿者协会
22	Friends of Green Environment	江苏绿色之友
23	Green Longjiang	绿色龙江
24	Green Anhui	安徽绿满江淮环境发展中心
25	Green Zhujiang	绿色珠江
26	Green River	绿色江河环保促进会
27	Blue Dalian	蔚蓝大连
28	Fujian Green Home	福建省绿家园环境友好中心
29	South China Nature Society	华南自然会
30	Green Kunming	绿色昆明
31	Chongqing Liangjiang Voluntary Service Center	重庆两江志愿者服务发展中心



32	Institute for Environment & Development	道和环境与发展研究所
33	Zhaolu Environmental Protection and Commonweal Service Center	朝露环保公益服务中心
34	Green Stone Environmental Action Network	绿石环境行动网络
35	Green Zhejiang	绿色浙江环保组织
36	Green Panjin	绿色盘锦
37	Gull Protection Association of Panjin City	盘锦市黑嘴鸥保护协会
38	Xiamen Greencross Association	厦门市绿十字环保志愿者中心
39	Hebei Green Sound	河北绿色之音
40	Nature University	自然大学 (北京市丰台区源头爱好者环境研究所)
41	Wuhu Ecology Center	芜湖生态中心
42	Wild China	野性中国
43	Wuling Mountains Conservation Federation	武陵山生态环境保护联合会
44	Fujian Environmental Protection Volunteers	福建省环保志愿者协会
45	Greenovation Hub	创绿中心
46	Lanzhou University Center for Rural Development and Biodiversity Protection	兰州大学社区与生物多样性保护研究中心
47	Wuhan Green Canaan	武汉绿江南环境咨询有限公司
48	Shenzhen Spring Environmental Protection Volunteer Association	深圳绿源环保志愿者协会
49	Institute of Public & Environmental Affairs	公众环境研究中心
50	Qinggan Environmental Exchange Center	青赣环境交流中心
51	Green Qilu	济南市绿行齐鲁环保公益服务中心
52	Green Oxygen Ecological & Environmental Protection Center	成都市锦江区绿氧生态环境保护中心
53	Xinxiang Environmental Protection Volunteer Association	新乡市环境保护志愿者协会
54	EnviroFriends	环友科学技术研究中心
55	Green Waterkeeper Environmental Center	厦门市湖里区绿水守护者生态环保中心
56	Xingche Environmental Commonweal Development Center	武汉行澈环保公益发展中心
57	Huangdao District Qingyuan Environmental Protection Public Service Center	青岛市黄岛区清源环保公益服务中心
58	Green Hebei	石家庄印渝环保科技有限公司 (绿行太行)
排名不分前后 (No particular order in listing)		